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ATCF II NEW JERSEY LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	CHAPTER THIRTEEN
	:	
KARINE G. PETERSIDE	:	
	:	Case No. 23-13870/CMG
	:	
Debtor(s)	:	HEARING DATE: April 3, 2024 at 9:00 am

**CERTIFICATION IN SUPPORT OF
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I, T.J. Ryan, hereby certify as follows:

1. I am a Director of Asset Management with the secured creditor, ATCF II New Jersey LLC ("Creditor"). This certification is made in support of the within motion for relief from the automatic stay. I have personal knowledge of the facts contained herein.

2. On May 5, 2023, Karine G. Peterside (the "Debtor") filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code. The Debtor's Chapter 13 Plan was confirmed on November 21, 2023.

3. Prior to the filing of the Debtor's bankruptcy, on December 3, 2020, Creditor purchased from the Township of Millstone tax sale certificate number 20-00002, ("Tax Lien") which is secured by the Debtor's real estate located at 14 Mountainview Court, Millstone, New Jersey, Block 37.03, Lot 26.16 (the "Property"). A copy of Creditor's Tax Lien is attached hereto

as Exhibit "A" and made a part hereof.

4. On June 8, 2023, Creditor filed a proof of claim in the sum of \$168,911.52, which claim is being paid through the Debtor's Chapter 13 plan.

5. The Debtor has failed and continues to fail to pay any of the real estate tax obligation for the Property post-petition for the third and fourth quarters of 2023 and the first quarter of 2024 in the total sum of \$17,224.79 plus continuing interest. It is evident that the Debtor is unable to satisfy the continuing real estate tax obligations for the Property. A copy of the tax printout from the Township of Millstone is attached hereto as Exhibit "B" and made a part hereof.

6. Additionally, the Debtor has failed and continues to fail to pay the total Trustee payments and is delinquent in the total sum of \$24,911.00. Consequently, Creditor will not receive payments on its proof of claim.

7. All of the above constitutes cause for granting Creditor relief from the automatic stay pursuant to section 362(d) of the Bankruptcy Code.

I certify that the foregoing statements are true to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 6, 2024

By: /s/ T.J. Ryan
T.J. Ryan, Director of Asset Management
ATCF II New Jersey LLC